



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

July 27, 2010

Mr. Glen McNitt, District Ranger
Eureka Ranger Station
949 U.S. Highway 93 N
Eureka, Montana 59917

Re: CEQ # 20100217, EPA Comments on Draft
Supplement EIS for Young Dodge Project

Dear Mr. McNitt:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Kootenai National Forest's Young Dodge Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The DSEIS identifies Alternative 1 Modified as the preferred alternative on Map 2-2, and this modified preferred alternative includes changes to treatment prescriptions in Units 12, 17, 21, 25, 29, 38, (primarily changing from seedtree to shelterwood harvests), and elimination of Unit 129 along with some minor boundary and acreage changes on some units. Total harvest acreage would be reduced by 435 acres, and harvest volume would be reduced by 3,508 CCF by the modification in the preferred alternative (i.e., from 19,502 CCF timber harvested on 2,927 acres in Alternative 1 to 15,994 CCF timber harvested on 2,492 acres in Alternative 1 Modified).

EPA supports the modifications in the preferred alternative since they will likely reduce erosion potential and soil disturbances from proposed timber harvests, although we still have concerns that the majority of timber harvesting is proposed to be carried out via more disturbing ground skidding methods that have greater potential for erosion and sediment production. Table 2-4 shows 3,891 acres of ground skidding vs. only 104 acres of skyline harvest and 104 acres of adverse forwarder harvest with Alternative 1 Modified. This includes harvests on units 12, 21, 212, 220 which already appear to be near the Regional Standard of 15 percent detrimental soil disturbance. We continue to believe that additional use of logging methods with less ground disturbance would be appropriate for logging units that are already near the Region Standard for cumulative detrimental soil disturbance levels.

We also note that 456 acres of mechanical piling is proposed on sensitive soils with Alternative 1 Modified (Table 3-4, page III-15). Landtypes 101, 252, 357, and 407 are stated to have “severe” sediment hazard with regard to timber management. From evaluation of Map 3-2 (Young Dodge Analysis Area Landtypes) and Map 2-2 showing harvest units in Alternative 1 Modified it appears that units 38, 40, and 138 may be located on landtype 357 that is identified as having a severe sediment hazard for timber management. We recommend that the FEIS discuss erosion potential for timber harvest units proposed on severe sediment hazard landtypes. We generally recommend avoidance of timber harvests on landtypes with severe erosion hazards, and encourage use of less ground disturbing logging methods as much as possible on erosive soils (e.g., skyline logging, helicopter logging, logging during winter on snow or frozen ground, etc.).

In addition, we remain concerned that the modified preferred alternative does not include closure of segments of Roads #303 and #7168 to allow open road density standards for MA 12 to be met. We support closure of 1.19 miles of Road #303 and 0.17 miles of Road #7168, both of which are currently open yearlong, which had been proposed in Alternative 3 to meet the MA 12 open road density standard of 0.75 mi/mi² during project implementation and over the long-term. Such road closures would reduce fragmentation of wildlife habitat and risks to wildlife security.

We do want to indicate that EPA supports reduction of hazardous fuels and fire risk in wildland urban interface (WUI) areas near homes and structures where there is high fire risk, and restoration of declining tree species such as Ponderosa pine and western larch. We also support the proposed decommissioning of 12.25 miles of existing road and placement of 27 miles of roads in long-term storage, and maintenance on portions of 98 miles of roads in order to reduce road impacts to soil and water resources. EPA fully supports road BMP and drainage improvements, and road decommissioning and reductions in road density, since these are critical to protecting aquatic health. Reductions in road density, especially road stream crossing density, are often correlated with improved aquatic health, as well as improved wildlife habitat and security. We are also pleased that the proposed project includes no new road construction, although 0.4 miles of road will be reconstructed, and 8.85 miles of existing unauthorized road will be added to the National Forest Road System.

Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Draft Supplemental EIS for the Young Dodge Project has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). EPA’s concerns regard potential erosion and sediment transport to surface waters during ground skidding timber harvests. A copy of EPA's rating criteria is attached.

We appreciate the opportunity to participate in the NEPA process and provide comments on the DSEIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Julie A. DalSoglio". The signature is fluid and cursive, with the first name "Julie" and last name "DalSoglio" clearly legible.

Julie A. DalSoglio
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

